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SPECIAL COUNSEL TO THE BANK OF NEW YORK, AS INDENTURE TRUSTEE FOR THE SENIOR SECURED NOTES

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re)	Chapter 11
SOLUTIA INC., et al.,)	Case No. 03-17949 (PCB)
Debtors.)	Jointly Administered

STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL FROM ORDER ENTERED BY THE BANKRUPTCY COURT ON NOVEMBER 26, 2007 [DOCKET NO. 4392]

The Bank of New York, as Indenture Trustee for the 11.25% Senior Secured Notes due 2009 issued by Solutia Inc. ("Solutia," and together with its affiliated debtors and debtors-in-possession, the "Debtors") and/or its predecessor, by and through its undersigned counsel, pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, hereby submits its statement of the issues to be presented and designates the record on appeal to the United States District Court for the Southern District of New York with respect to the Order Denying Emergency Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Entry of an Order Granting Relief from the Automatic Stay entered by the United States Bankruptcy Court

for the Southern District of New York (Judge Prudence Carter Beatty) on November 26, 2007 [Docket No. 4392].

Issues to be Presented on Appeal

- 1. Did the bankruptcy court err in concluding that no grounds exist to lift the automatic stay to permit a notice of deceleration to be delivered by holders of a majority in amount of the Senior Secured Notes?
- 2. Did the bankruptcy court err in concluding that no grounds exist to lift the automatic stay to permit the holders of the Senior Secured Notes to deliver a notice to accept the Change of Control Payment (as defined in the Indenture¹) (by surrendering their Senior Secured Notes as provided in the Indenture) in accordance with Section 4.08 of the Indenture?
- 3. Did the bankruptcy err as a matter of law or fact in finding that the Emergency Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Entry of an Order Granting Relief From the Automatic Stay [Docket No. 4319] was untimely, notwithstanding Section 6.03 of the Indenture?

Designation of Items to Be Included in the Record on Appeal²

- Warrant Agreement between Solutia Inc. and HSBC Bank USA, dated July
 9, 2002
- Quarterly Report (Form 10-Q) filed with the Securities and Exchange
 Commission by Solutia Inc. on August 1, 2002

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[&]quot;Indenture" as used herein means the indenture executed by and between SOI Funding Corp., a Delaware corporation and a special purpose entity, as issuer and predecessor to Solutia, and HSBC Bank USA, as indenture trustee, on July 9, 2002, and amended from time to time thereafter, pursuant to which Solutia and/or its predecessor issued the Senior Secured Notes and warrants to purchase Solutia common stock.

Each designated item includes any exhibits to such item. Each reference to "Docket No. ___" includes all documents within that Docket number.

- 3. Form S-4 Registration Statement under the Securities Act of 1933 filed with the Securities and Exchange Commission by Solutia Inc. in connection with the Senior Secured Notes on or about September 17, 2002
- 4. Amendment No. 1 to Form S-4 Registration Statement under the Securities

 Act of 1933 filed with the Securities and Exchange Commission by Solutia Inc. in connection with
 the Senior Secured Notes on or about October 17, 2002
- Quarterly Report (Form 10-Q) filed with the Securities and Exchange
 Commission by Solutia Inc. on November 14, 2002
- 6. Order signed on 12/18/2003 Directing Joint Administration of Related Chapter 11 Cases, dated December 18, 2003 [Docket No. 36]
- 7. Agreement by which the Bank of New York replaced HSBC Bank USA as the Senior Secured Notes Trustee, dated January 16, 2004
- 8. Final Order (I) Approving Use of Cash Collateral, (II) Authorizing Debtors to Incur Post-petition Secured Indebtedness and (III) Granting Security Interests and Superpriority Claims Pursuant to Sections 105(a), 361, 363, 364(c), 364(d) and 364(e) of the Bankruptcy Code and Bankruptcy Rules 2002, 4001, and 9014, dated January 16, 2004 [Docket No. 278]
- 9. Solutia Business Enterprises Inc.'s Schedules of Assets and Liabilities (Case No. 03-17948), dated March 2, 2004 [Docket No. 498]
- Solutia Systems, Inc.'s Schedules of Assets and Liabilities (Case No. 03-17950), dated March 2, 2004 [Docket No. 504]
- Monchem International, Inc.'s Schedules of Assets and Liabilities (CaseNo. 03-17954), dated March 2, 2004 [Docket No. 511]
- Solutia Investments, LLC's Schedules of Assets and Liabilities (Case No. 03-17956), dated March 2, 2004 [Docket No. 514]

- 13. Monchem, Inc.'s Schedules of Assets and Liabilities (Case No. 03-17958), dated March 2, 2004 [Docket No. 518]
- CPFilms Inc.'s Schedules of Assets and Liabilities (Case No. 03-17952),
 dated March 2, 2004 [Docket No. 528]
- 15. CPFilms Inc.'s Amended Schedules A, B, D, F and G, dated September 22, 2004 [Docket No. 1428]
- 16. Monchem, Inc.'s Amended Schedule F, dated September 22, 2004 [Docket No. 1430]
- 17. Monchem International, Inc.'s Amended Schedules B and F, dated September 22, 2004 [Docket No. 1432]
- Solutia Investments, LLC's Amended Schedule F, dated September 22,
 2004 [Docket No. 1437]
- Solutia Systems, Inc.'s Amended Schedules D and F, dated September 22,
 [Docket No. 1441]
- 20. Order Setting a Final Date to File Proofs of Claim and Approving Related Notice Procedures signed on September 30, 2004, filed October 1, 2004 [Docket No. 1475]
- Debtors' Joint Plan of Reorganization, dated February 14, 2006 [DocketNo. 2855]
- Debtors' Disclosure Statement Pursuant to Section 1125 of the BankruptcyCode, dated February 14, 2006 [Docket No. 2856]
- 23. Objection of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to the Debtors' Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code, dated May 22, 2006 [Docket No. 3136]

- 24. Debtors' First Amended Joint Plan of Reorganization, dated May 16, 2007

 [Docket No. 3830]
- 25. Debtors' First Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code, dated May 16, 2007 [Docket No. 3831]
- 26. Debtors' Objection to Claim No. 6210 filed by The Bank of New York as Indenture Trustee for the 2009 Noteholders, dated June 22, 2007 [Docket No. 3938]
- 27. Memorandum of Law in Support of Debtors' Objection to Claim No. 6210 filed by The Bank of New York as Indenture Trustee for the 2009 Noteholders, dated June 22, 2007 [Docket No. 3939]
- 28. Declaration of James M. Sullivan in Support of Solutia's Objection to Claim No. 6210 Filed by The Bank of New York as Indenture Trustee for the 2009 Noteholders, dated

June 22, 2007 [Docket No. 3940]

- 29. Debtors' Motion for an Order (I) Approving the Disclosure Statement; (II) Establishing a Record Date for Voting on the Plan of Reorganization; (III) Approving Solicitation Packages and Procedures for Distribution Thereof; (IV) Approving the Procedures for the Rights Offering; (V) Approving the Form of Ballots; (VI) Establishing Procedures for Voting on the Plan; and (VII) Establishing Notice and Objection Procedures for Confirmation of the Plan, dated May 25, 2007 [Docket No. 3853]
- 30. Objection of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to the Debtors' First Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code, dated June 29, 2007 [Docket No. 3971]
- 31. Debtors' Second Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code, dated July 9, 2007 [Docket No. 4014]

- 32. Debtors' Second Amended Joint Plan of Reorganization, dated July 9, 2007 [Docket No. 4015]
- Solutia's Reply to Objections to Solutia's First Amended Disclosure
 Statement, dated July 9, 2007 [Docket No. 4016]
- 34. Joinder of the Official Committee of Unsecured Creditors to Solutia's Reply to Objections to Solutia's First Amended Disclosure Statement, dated July 9, 2007 [Docket No. 4017]
- 35. Exhibits to Second Amended Disclosure Statement, dated July 9, 2007[Docket No. 4018]
- 36. Supplemental Objection of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to, and Emergency Motion to Continue Hearing on, the Debtors' First Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code, dated July 9, 2007 [Docket No. 4019]
- 37. Declaration of John K. Cunningham in Support of Supplemental Objection of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to, and Emergency Motion to Continue Hearing on, the Debtors' First Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code, dated July 9, 2007 [Docket No. 4020]
- 38. Initial Statement of the Official Committee of Unsecured Creditors in Support of Debtors' Objection to Claim No. 6210 Filed by The Bank of New York as Indenture Trustee for the 2009 Noteholders, dated July 25, 2007 [Docket No. 4074]
- 39. Preliminary Response of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to the Debtors' Objection to Claim No. 6210, dated July 25, 2007 [Docket No. 4075]

- 40. Memorandum of Law in Support of the Preliminary Response of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to the Debtors' Objection to Claim No. 6210, dated July 25, 2007 [Docket No. 4076]
- 41. Declaration of John K. Cunningham in Support of Preliminary Response of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to Debtors' Objection to Claim No. 6210, dated July 25, 2007 [Docket No. 4077]
- 42. Transcript of Hearing Held on 07/17/2007, filed July 23, 2007 [Docket No. 4115]
- 43. Solutia Inc.'s Statement with Respect to Scheduling Issues Regarding the Objection to the 2009 Proof of Claim, dated July 25, 2007 [Docket No. 4078]
- 44. Transcript of Hearing Held on 08/01/2007, filed August 6, 2007 [Docket No. 4125]
- 45. Notice of Hearing on and Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Partial Summary Judgment Pursuant to Rule 7056 of the Federal Rules of Bankruptcy Procedure, dated September 21, 2007 [Docket No. 4206]
- 46. Memorandum of Law in Support of Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Partial Summary Judgment Pursuant to Rule 7056 of the Federal Rules of Bankruptcy Procedure, dated September 21, 2007 [Docket No. 4207]
- 47. Statement of Undisputed Facts in Support of Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Partial Summary Judgment Pursuant to Rule 7056 of the Federal Rules of Bankruptcy Procedure, dated September 21, 2007 [Docket No. 4208]

- 48. Notice of Joint Motion for Partial Summary Judgment, dated September 21, 2007, signed by the Debtors and the Official Committee of Unsecured Creditors [Docket No. 4209]
- 49. Declaration of J. Christopher Shore in Support of Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Partial Summary Judgment Pursuant to Rule 7056 of the Federal Rules of Bankruptcy Procedure, dated September 21, 2007 [Docket No. 4210]
- 50. Memorandum of Law in Support of the Joint Motion for Partial Summary Judgment Sustaining the Debtors' Objection to Claim No. 6210 Filed by The Bank of New York as Indenture Trustee for the 2009 Noteholders, dated September 21, 2007 [Docket No. 4211]
- 51. The Official Committee of Unsecured Creditors' Objection to the Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Partial Summary Judgment, dated October 10, 2007 [Docket No. 4229]
- 52. Solutia's Opposition Brief to the Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Partial Summary Judgment Pursuant to Rule 7056 of the Federal Rules of Bankruptcy Procedure, dated October 10, 2007 [Docket No. 4230]
- 53. Memorandum of Law of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, in Response to the Joint Motion for Partial Summary Judgment Sustaining the Debtors' Objection to Claim No. 6210 filed by The Bank of New York as Indenture Trustee for the 2009 Noteholders, dated October 10, 2007 [Docket No. 4232]
- 54. The Bank of New York's Response to the Facts Set Forth by the Debtors and Creditors' Committee in Support of Their Joint Motion for Partial Summary Judgment Sustaining the Debtors' Objection to Claim No. 6210 filed by The Bank of New York as Indenture Trustee for the 2009 Notes, dated October 10, 2007 [Docket No. 4233]

- 55. Supplemental Declaration of J. Christopher Shore in Support of Memorandum of Law of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, in Response to the Joint Motion for Partial Summary Judgment Sustaining the Debtors' Objection to Claim No. 6210 filed by The Bank of New York as Indenture Trustee for the 2009 Noteholders and Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Partial Summary Judgment Pursuant to Rule 7056 of the Federal Rules of Bankruptcy Procedure, dated October 10, 2007 [Docket No. 4235]
- 56. So Ordered Stipulation and Agreed Scheduling Order, signed by Judge Beatty on October 10, 2007 [Docket No. 4236]
- 57. Debtors' Fifth Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code, dated October 15, 2007 [Docket No. 4241]
- 58. Exhibits A-H to the Fifth Amended Disclosure Statement, dated October 15, 2007 [Docket No. 4242]
- 59. Debtors' Fifth Amended Joint Plan of Reorganization, dated October 15,2007 [Docket No. 4243]
- 60. Debtors' Proposed Disclosure Statement Order with Exhibits A-K, dated October 15, 2007 [Docket No. 4244]
- 61. Exhibits A-P to the Fifth Amended Plan of Reorganization, dated October 15, 2007 [Docket No. 4245]
- 62. Exhibit P to Debtors' Fifth Amended Plan of Reorganization (Executed Version), dated October 18, 2007 [Docket No. 4249]
- 63. Objection of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to the Debtors' Fifth Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code, dated October 18, 2007 [Docket No. 4250]

- 64. Order (I) Approving the Disclosure Statement; (II) Establishing a Record Date for Voting on the Plan of Reorganization; (III) Approving Solicitation Procedures; (IV) Approving Rights Offering Procedures; (V) Approving the Forms of Ballots and Manner of Notice; and (VI) Establishing Notice and Objection Procedures for the Confirmation of the Plan, dated
- October 19, 2007 [Docket No. 4252]
- 65. Solutia's Fifth Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code dated October 19, 2007, filed October 19, 2007 [Docket No. 4254]
- 66. Exhibits A-H to Solutia's Fifth Amended Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code Dated October 19, 2007, filed October 19, 2007 [Docket No. 4255]
- 67. Solutia's Fifth Amended Joint Plan of Reorganization, filed October 19, 2007 [Docket No. 4256]
- 68. Exhibits A-P to Solutia's Fifth Amended Joint Plan of Reorganization

 Dated October 19, 2007, filed November 22, 2007 [Docket No. 4257]
- 69. Transcript of Hearing Held on 10/19/2007, filed October 23, 2007 [Docket No. 4259]
- 70. Transcript of Hearing Held on 07/10/2007, filed July 16, 2007 [Docket No. 4274]
- 71. Transcript of Hearing Held on 07/26/2007, filed August 2, 2007 [Docket No. 4275]
- 72. Debtors' Fifty First Omnibus Objections to Claims, filed October 30, 2007

 [Docket No. 4281]

- 73. Transcript of Hearing Held on 10/31/2007, filed November 2, 2007 [Docket No. 4293]
- 74. Motion for Entry of an Order Under Section 363 of the Bankruptcy Code

 (A) Approving Solutia's Entry into an Exit Financing Commitment and (B) Authorizing Solutia to

 Pay Certain Fees and Expenses in Connection Therewith, dated November 6, 2007 [Docket No.

 4296]
- 75. Memorandum of Law in Support of Solutia's Motion for Entry of an Order Under Section 363 of the Bankruptcy Code (A) Approving Solutia's Entry into an Exit Financing Commitment and (B) Authorizing Solutia to Pay Certain Fees and Expenses in Connection Therewith, dated November 6, 2007 [Docket No. 4297]
- 76. Declaration of James M. Sullivan in Support of Solutia's Motion for Entry of an Order Under Section 363 of the Bankruptcy Code (A) Approving Solutia's Entry into an Exit Financing Commitment and (B) Authorizing Solutia to Pay Certain Fees and Expenses in Connection Therewith, dated November 6, 2007 [Docket No. 4298]
- 77. Memorandum Decision on Joint Motion for Partial Summary Judgment with Respect to Claim No. 6210 (11.25% Senior Secured Notes), dated November 9, 2007

 [Docket No. 4307]
- 78. First Request of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for the Production of Documents to the Debtors in Connection With Solutia's Fifth Amended Joint Plan of Reorganization, dated November 9, 2007
- 79. The Bank of New York's Notice of Taking Deposition of Debtors, dated November 9, 2007
- 80. Emergency Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, Pursuant to Federal Rule of Civil Procedure 59(e) and Local Bankruptcy

Rule 9023-1(a) for Reconsideration of Memorandum Decision on Joint Motion for Partial Summary Judgment with Respect to Claim No. 6210 (11.25% Senior Secured Notes), dated November 15, 2007 [Docket No. 4317]

- 81. Memorandum of Law in Support of Emergency Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, Pursuant to Federal Rule of Civil Procedure 59(e) and Local Bankruptcy Rule 9023-1(a) for Reconsideration of Memorandum Decision on Joint Motion for Partial Summary Judgment with Respect to Claim No. 6210 (11.25%) Senior Secured Notes), dated November 15, 2007 [Docket No. 4318]
- 82. Emergency Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Entry of an Order Granting Relief from the Automatic Stay, dated November 15, 2007 [Docket No. 4319]
- 83. Proposed Order Granting Emergency Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Entry of an Order Granting Relief from the Automatic Stay, dated November 15, 2007 [Docket No. 4320]
- 84. Memorandum of Law in Support of the Emergency Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Entry of an Order Granting Relief from the Automatic Stay, dated November 15, 2007 [Docket No. 4321]
- 85. Joint Objection of the Debtors and the Official Committee of Unsecured Creditors to the Emergency Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Entry of an Order Granting Relief from the Automatic Stay, dated November 19, 2007 [Docket No. 4341]
- 86. Joint Opposition Brief of Solutia and the Official Committee of Unsecured Creditors to the Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Reconsideration, dated November 19, 2007 [Docket No. 4342]

- 87. Plan Supplement to Debtors' Fifth Amended Joint Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code, dated November 19, 2007 [Docket No. 4347]
- 88. Order Under Section 363 of the Bankruptcy Code (A) Approving Solutia's Entry into an Exit Financing Commitment and (B) Authorizing Solutia to Pay Certain Fees and Expenses in Connection Therewith, dated November 21, 2007 [Docket No. 4352]
- 89. Errata Order Regarding Memorandum Decision on Joint Motion for Partial Summary Judgment with Respect to Claim No. 6210 (11.25% Senior Secured Notes), dated November 21, 2007 [Docket No. 4356]
- 90. Memorandum of Law in Support of Debtors' Fifth Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code Dated October 19, 2007, filed November 21, 2007 [Docket No. 4357]
- 91. Debtors' Supplemental Memorandum of Law in Support of the Global Settlement, dated November 21, 2007 [Docket No. 4358]
- 92. Declaration of Jeffry N. Quinn in Support of the Global Settlement, dated November 21, 2007 [Docket No. 4359]
- 93. Objection of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to Solutia's Fifth Amended Joint Plan of Reorganization and Memorandum of Law in Support Thereof, dated November 21, 2007 [Docket No. 4365]
- 94. Declaration of Timothy P. O'Connor in Support of Objection of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to Solutia's Fifth Amended Joint Plan of Reorganization, dated November 21, 2007 [Docket No. 4366]
- 95. Notice of Presentment of Stipulation and Order Allowing the Claims of Ableco Finance LLC, dated November 26, 2007 [Docket No. 4389]

- 96. Order Denying Emergency Motion of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, for Entry of an Order Granting Relief from the Automatic Stay, dated November 26, 2007 [Docket No. 4392]
- 97. Final Order Granting Partial Summary Judgment in Favor of the Debtors and Creditors' Committee Regarding the Debtors' Objection to Claim No. 6210 filed by The Bank of New York as Indenture Trustee for the 2009 Noteholders, dated November 26, 2007 [Docket No. 4393]
- 98. Order Re Emergency Motion of The Bank of New York, as Indenture
 Trustee for the Senior Secured Notes Pursuant to Federal Rule of Civil Procedure 59(e) and Local
 Bankruptcy Rule 9023-1(a) for Reconsideration of Memorandum Decision on Joint Motion for
 Partial Summary Judgment with Respect to Claim No. 6210 (11.25% Senior Secured Notes),
 dated November 26, 2007 [Docket No. 4394]
- 99. Motion of the Official Committee of Unsecured Creditors for Application of Certain Post-Petition Payments Made to the 2009 Indenture Trustee on Behalf of the 2009 Noteholders in Reduction of the Principal Amount of the 2009 Noteholders' Claim, dated November 27, 2007 [Docket No. 4403]
- 100. Memorandum of Law in Support of Motion of the Official Committee of Unsecured Creditors for Application of Certain Post-Petition Payments Made to the 2009 Indenture Trustee on Behalf of the 2009 Noteholders in Reduction of the Principal Amount of the 2009 Noteholders' Claim, dated November 27, 2007 [Docket No. 4405]
- 101. Solutia's Response to the Objection of The Bank of New York as Indenture
 Trustee for the 2009 Notes to Solutia's Fifth Amended Joint Plan of Reorganization, dated
 November 28, 2007 [Docket No. 4411]

- 102. Certification of Jane Sullivan with Respect to the Tabulation of Votes on the Debtors' Fifth Amended Joint Plan, dated November 28, 2007 [Docket No. 4419]
- 103. Statement of the Official Committee of Unsecured Creditors of Solutia Inc. et al., in Support of Confirmation of the Debtors' Fifth Amended Joint Plan of Reorganization and Joinder to Solutia's Response to the Objection of The Bank of New York as Indenture Trustee for the 2009 Notes, dated November 28, 2007 [Docket No. 4423]
 - 104. Notice of Appeal, dated November 28, 2007 [Docket No. 4431]
 - 105. Notice of Appeal, dated November 28, 2007 [Docket No. 4432]
 - 106. Notice of Appeal, dated November 28, 2007 [Docket No. 4433]
- 107. Joinder of the Official Committee of Equity Security Holders to Solutia's Response to the Objections of The Bank of New York as Indenture Trustee for the 2009 Notes to Solutia's Fifth Amended Joint Plan of Reorganization, dated November 29, 2007 [Docket No. 4434]
- 108. Order Confirming Solutia's Fifth Amended Joint Plan of Reorganization Under Chapter 11 of The Bankruptcy Code and Approving the Global Settlement, Monsanto Settlement and the Retiree Settlement, dated November 29, 2007 [Docket No. 4444]
- 109. Transcript of Hearing held on 11/20/2007, filed November 27, 2007

 [Docket No. 4445]
 - 110. Amended Notice of Appeal, dated November 30, 2007 [Docket No. 4453]
- 111. Objection of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to Motion of the Official Committee of Unsecured Creditors for Application of Certain Post-petition Payments Made to the 2009 Indenture Trustee on Behalf of the 2009 Noteholders in Reduction of the Principal Amount of the 2009 Noteholders' Claim, dated December 5, 2007 [Docket No. 4464]

- 112. Memorandum of Law in Support of Objection of The Bank of New York, as Indenture Trustee for the Senior Secured Notes, to Motion of the Official Committee of Unsecured Creditors for Application of Certain Post-petition Payments Made to the 2009 Indenture Trustee on Behalf of the 2009 Noteholders in Reduction of the Principal Amount of the 2009 Noteholders' Claim, dated December 5, 2007 [Docket No. 4465]
- 113. Stipulation between The Debtors and The Bank of New York, As Indenture Trustee for the Senior Secured Notes, dated December 6, 2007 [Docket No. 4472]
- 114. Reply to the Objection of The Bank of New York, As Indenture Trustee for the Senior Secured Notes, to Motion of The Official Committee of Unsecured Creditors for Application of Certain Post-Petition Payments Made to the 2009 Indenture Trustee on behalf of the 2009 Noteholders in Reduction of the Principal Amount of the 2009 Noteholders' Claim, dated December 7, 2007 [Docket No. 4473]
- 115. Solutia's Joinder to the Motion of the Official Committee of Unsecured Creditors for Application of Certain Post-Petition Payments Made to the 2009 Indenture Trustee on behalf of the 2009 Noteholders in Reduction of the Principal Amount of the 2009 Noteholders' Claim, dated December 7, 2007 [Docket No. 4474]
- Sur-reply of The Bank of New York, as Indenture Trustee, to Reply to the 116. Objection of The Bank of New York, As Indenture Trustee for the Senior Secured Notes, to Motion of The Official Committee of Unsecured Creditors for Application of Certain Post-Petition Payments Made to the 2009 Indenture Trustee on behalf of the 2009 Noteholders in Reduction of the Principal Amount of the 2009 Noteholders' Claim, dated December 10, 2007 [Docket No. 4478]
 - 117. Transcript of Hearing held on 11/29/2007

Dated: December 10, 2007 Miami, Florida

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By: /s/ John K. Cunningham
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SPECIAL COUNSEL TO THE BANK OF NEW YORK, AS INDENTURE TRUSTEE FOR THE SENIOR SECURED NOTES